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REMARKS/ARGUMENTS

In the Office Action issued November 25, 2008, claims 1, 4, 11-14, and 17-20

were rejected under 35 U.S.C. § 102(e) as being anticipated by Ukrainczyk et al., U.S.

Patent App. Pub. No. 2002/0022956 ("Ukrainczyk"). Claim 2 was rejected under 35

U.S.C. § 103(a) as being unpatentable over Ukrainczyk in view of Tokuda et al., U.S.

Patent App. Pub. No. 2003/0050921 ("Tokuda"). Claims 3 and 5-10 rejected under 35

U.S.C. § 103(a) as being unpatentable over Ukrainczyk in view of Mohan et al., U.S.

Patent No. 7,194,483 ("Mohan"). Claims 1-14, 17, and 20 were rejected under 35 U.S.C.

§ 101 as being directed to non-statutory subject matter. Claims 1-14 and 17-20 were

objected to.

Claims 1-14 and 17-20, and 27-28 are now pending in this application. Claim 1

has been amended to clearly recite a concrete and tangible result, which is displaying the

processed textual information via a user output interface. Support for this amendment

may be found in the specification, for example, at page 15, lines 31-33. Claims 17, 18,

and 20 have been amended to clearly recite that they are computer-implemented and so

include the necessary physical objects to constitute a machine or manufacture, as required

by statute. Support for these amendments may be found, for example, in Fig. 1 and the

associated text in the specification. New claims 27 and 28 include subject matter similar

to claim 1 and, similarly to claim 1, are drawn to generating textual information

expressing term-to-term relationships, and displaying this information to a user. Claim

27 is directed to a computer system and claim 28 is directed a computer program product.

No new matter has been added.

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Claims 17-19 have been amended as suggested by the Examiner in order to

overcome the objections and claim 20 has been similarly amended. Claims 1-14, as

amended in the Preliminary Amendment filed July 15, 2004, do not include the words

"characterized by" and claims 17-20 as amended in the Preliminary Amendment filed

July 15, 2004, do not include the words "characterized in that," Claims 17-20 as

amended in the Preliminary Amendment filed July 15, 2004, do not include numeric

numbers or the term "(O)." All objections to the claims are believed to be overcome.

The present invention is directed to processing digitized textual information, the

information being organized in terms, documents and document corpora, where each

document contains at least one term and each document corpus contains at least one

document, generating textual information expressing term-to-term relationships, and

displaying this information to a user. The Applicant believes that it would be useful for

the Examiner's understanding of the invention to refer to the Assignee's web page

(www.silobreaker.com), or more precisely:

http://www.silobreaker.com/FlashNetwork.aspx?DrillDownItems=11 333705 (FLASH

PLAYER VERSION), or

http://www.silobreaker.com/Network.aspx?DrillDownItems=11 333705 (NON-FLASH

PLAYER VERSION).

The same information is also available via the "In Focus" box of the 360-page, i.e.

http://www.silobreaker.com/View360.aspx?Item=11 333705.

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The Applicant respectfully submits that claims 1-14 are not anticipated by

Ukrainczyk. Ukrainczyk discloses a method for classifying documents into a plurality of

categories. To this aim, category vectors are produced. A feature vector for each

document is also produced. A plurality of category scores is generated by multiplying the

category vector by the document vector, and if the category score for a given category

exceeds a threshold value, the document in question is classified into this category (see

e.g. Ukrainczyk at para, [0012]).

The present invention, on the other hand, concerns finding relationships between

various terms. This is quite different from the classification disclosed by Ukrainczyk. As

a result. Ukrainczyk does not disclose or suggest receiving the term-to-concept vectors

for the document corpus and on basis thereof generating a term-term matrix describing a

term-to-term relationship between the terms in the document corpus, and processing the

term-term matrix into processed textual information and displaying the processed textual

information via a user output interface, as required, for example, by claim 1. In particular,

Ukrainczyk discloses three data structures that are used: symbol table 70, feature table 80,

and topic spotter matrix 90. As disclosed in para. [0030], feature table 80 is a table of

multiple-symbol features useful for topic-spotting. The single-symbol features are found

in symbol table 70. Finally, topic spotter matrix 90 is a matrix comprised of feature IDS

510 (rows) and concept nodes (columns). The matrix values are attributes of the

relationship between features and concepts, including feature frequency data determined

by calculating the number of times the feature occurred in documents tagged to that

concept node (count), and assigning a value representative of the strength of association

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between the feature and the concept (weight). At the conclusion of the training phase,

topic spotter matrix 90 is comprised of a combination of automatically generated data and

manually inputted concept evidence vectors from REE Table 50. None of these data

structures disclosed by Ukrainczyk is a term-term matrix describing a term-to-term

relationship between the terms in the document corpus, as is required, for example, by

claim 1. Likewise, since Ukrainczyk does not disclose or suggest the term-term matrix

describing a term-to-term relationship between the terms in the document corpus.

Ukrainczyk also does not disclose or suggest other features of the claims, such as

processing the term-term matrix into processed textual information and displaying the

processed textual information via a user output interface, as is required, for example, by

claim 1.

Ukrainczyk is silent about these features because the problem solved by

Ukrainczyk exclusively concerns classification of documents. Consequently, there is no

need, or incentive, for Ukrainczyk to establish a term-term relationship, which is a

comparatively processing intensive task and which would serve no purpose in the system

of Ukrainczyk. In addition, the present invention is advantageous because it is capable of

performing the necessary calculations in real time. It appears that the Ukrainczyk method

requires a training step. Hence, real time implementation appears to be excluded.

Therefore, claims 1, 4, 11-14, and 17-20 are not anticipated by Ukrainczyk.

The Applicant respectfully submits that claim 2 is not unpatentable over

Ukrainczyk in view of Tokuda because even if Ukrainczyk and Tokuda were combined

as suggested by the Examiner, the resulting combination still would not disclose or

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suggest the requirements of the claims. As discussed above, Ukrainczyk does not

disclose or suggest receiving the term-to-concept vectors for the document corpus and on

basis thereof generating a term-term matrix describing a term-to-term relationship

between the terms in the document corpus, and processing the term-term matrix into

processed textual information and displaying the processed textual information via a user

output interface, as is required by claim 1, from which claim 2 depends.

Tokuda discloses a computer-based information search and retrieval system and

method for retrieving textual digital objects uses the projections of the documents onto

both the reduced document space characterized by the singular value decomposition-

based latent semantic structure and its orthogonal space. However, Tokuda does not

disclose or suggest receiving the term-to-concept vectors for the document corpus and on

basis thereof generating a term-term matrix describing a term-to-term relationship

between the terms in the document corpus, and processing the term-term matrix into

processed textual information and displaying the processed textual information via a user

output interface.

As a result, even if Ukrainczyk and Tokuda were combined as suggested by the

Examiner, the resulting combination still would not disclose or suggest receiving the

term-to-concept vectors for the document corpus and on basis thereof generating a term-

term matrix describing a term-to-term relationship between the terms in the document

corpus, and processing the term-term matrix into processed textual information and

displaying the processed textual information via a user output interface.

Therefore, claim 2 is not is not unpatentable over Ukrainczyk in view of Tokuda.

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The Applicant respectfully submits that claims 3 and 5-10 are not unpatentable

over Ukrainczyk in view of Mohan because even if Ukrainczyk and Mohan were

combined as suggested by the Examiner, the resulting combination still would not

disclose or suggest the requirements of the claims. As discussed above, Ukrainczyk does

not disclose or suggest receiving the term-to-concept vectors for the document corpus and

on basis thereof generating a term-term matrix describing a term-to-term relationship between the terms in the document corpus, and processing the term-term matrix into

processed textual information and displaying the processed textual information via a user

output interface, as is required by claim 1, from which claim 2 depends.

Mohan discloses analyzing and categorizing and exploring or querying

unstructured information and tracking trends and exceptions. However, Mohan does not

disclose or suggest receiving the term-to-concept vectors for the document corpus and on

basis thereof generating a term-term matrix describing a term-to-term relationship

between the terms in the document corpus, and processing the term-term matrix into

processed textual information and displaying the processed textual information via a user

output interface.

As a result, even if Ukrainczyk and Mohan were combined as suggested by the

Examiner, the resulting combination still would not disclose or suggest receiving the

term-to-concept vectors for the document corpus and on basis thereof generating a term-

term matrix describing a term-to-term relationship between the terms in the document

corpus, and processing the term-term matrix into processed textual information and

displaying the processed textual information via a user output interface.

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Therefore, claims 3 and 5-10 are not is not unpatentable over Ukrainczyk in view of Mohan

Each of the claims now pending in this application is believed to be in condition for allowance. Accordingly, favorable reconsideration of this case and early issuance of the Notice of Allowance are respectfully requested.

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Additional Fees:

The Commissioner is hereby authorized to charge any insufficient fees or credit any

overpayment associated with this application to Deposit Account No. 50-4545 (5233-064-

US01).

Conclusion

In view of the foregoing, all of the Examiner's rejections to the claims are

believed to be overcome. The Applicants respectfully request reconsideration and

issuance of a Notice of Allowance for all the claims remaining in the application. Should

the Examiner feel further communication would facilitate prosecution, he is urged to call

the undersigned at the phone number provided below.

Respectfully Submitted.

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